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Attorneys for Plaintiffs The Spearmint Rhino
Companies Worldwide, Inc. and K-Kel, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

The Spearmint Rhino Companies Worldwide,
Inc. and K-Kel, Inc.,

Plaintiffs,

vs.

Chang's Dynasty LLC and Alan Chang,

Defendants.

Civil Action No. 2:23-cv-02040-ART-BNW

Honorable Anne R. Traum
Magistrate Judge Brenda Weksler

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
(SECOND REQUEST)**

Plaintiffs The Spearmint Rhino Companies Worldwide, Inc. and K-Kel, Inc.
("Plaintiffs") and Defendants Chang's Dynasty LLC and Alan Chang ("Defendants")
(collectively, "the Parties") hereby stipulate as follows pursuant to LR IA 6-1 and LR 26-3:

I. COMPLETED DISCOVERY

The Parties have engaged in considerable discovery, with Plaintiffs and Defendants
having served multiple sets of interrogatories and requests for production. The parties have also

exchanged numerous documents. The parties are actively working to schedule depositions at mutually convenient times.

II. REMAINING DISCOVERY

While some responses to written discovery remain outstanding, the parties have agreed, absent extraordinary circumstances, not to serve further written discovery, except for deposition notices and subpoenas. Further, the Parties presently anticipate needing to take 1 – 5 individual depositions each, and depositions of corporate parties under Fed. R. Civ. P. 30(b)(6). Once fact discovery is complete, the Parties expect to disclose experts and take expert depositions.

III. THERE IS GOOD CAUSE TO EXTEND THE DISCOVERY DEADLINE

The parties agreed to an ambitious discovery schedule and have worked diligently and cooperatively to complete discovery by the current discovery deadline. However, unexpected events have prevented the parties from doing so and thus necessitated this request for additional time. More specifically, one of Plaintiff's principals, who is approximately 80 years old, has tested positive for COVID and presently remains under a physician's care. This resulted in his deposition being postponed. Further, the principals of the Parties have engaged in discussions in hopes that they might find a path to resolve this matter.

For these reasons, the parties have conferred and respectfully requests a 60-day extension of the discovery deadline and case schedule.

IV. PROPOSED EXTENSION

	Current Deadline	New Deadline
Close of Fact Discovery	September 30, 2024	November 29, 2024
F.R.C.P. 26(a)(2) Disclosures	October 28, 2024	December 27, 2024
Disclosure of Rebuttal Experts	November 25, 2024	January 24, 2025
Expert Discovery Closes	December 20, 2024	February 21, 2025
Dispositive Motions	January 20, 2025	March 21, 2025
Pretrial Order	February 18, 2025	April 18, 2025, but if dispositive motions are

		timely filed, then the date for filing the joint pretrial order shall be suspended until thirty (30) days after decisions on any dispositive motions, or upon further order of the Court extending the time period in which to file the joint pretrial order
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Dated: September 9, 2024

STRADLING YOCCA CARLSON & RAUTH LLP

By: /s/ Douglas Q. Hahn
Douglas Q. Hahn (admitted *pro hac vice*)

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By: /s/ Maxwell Goss
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*Attorneys for Defendants
Chang's Dynasty LLC and Alan Chang*

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: September 10, 2024

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that a true and correct copy of the document is being served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Douglas Q. Hahn